

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

CenterPoint Energy Field Services Inc
CenterPoint Energy Field Services Inc - Clear Lake Compressor Station
Williams <NO DATA FOUND> Parish, Louisiana
Agency Interest Number: 166277
Activity Number: PER20090001
Proposed Permit Number: 2420-00107-V0

I. APPLICANT

Company:

CenterPoint Energy Field Services Inc - Clear Lake Compressor Station
PO Box 21734
Shreveport, Louisiana 71151-1734

Facility:

CenterPoint Energy Field Services Inc
on Parish Rd 408 0.75 Mi W of
Williams<NO DATA FOUND> Parish, Louisiana
<<Approximate geographic coordinates or UTM coordinates>>

II. FACILITY AND CURRENT PERMIT STATUS

{Provide a description of the agency interest facility operating process here.}

CenterPoint Energy Field Services Inc - Clear Lake Compressor Station is a designated Part 70 source. Several Part 70 permits have been issued to the operating units within the [complex]. These include:

Permit No.	Unit or Source	Date Issued

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The facility submitted timely applications for initial Part 70 permits for other units in the [complex], which continues to operate under the state permits listed below [or under Grandfather status].

Permit No.	Unit or Source	Date Issued

{If PSD/Acid Rain permits were issued to the facility, cite the permits numbers here: In addition, PSD Permit PSD-LA-XXX (date issued) and Acid Rain Permit XXXX-IVX (date issued) were also issued to the complex.}

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on [date] requesting a Part 70 operating permit for the [facility name]. The application was subsequently revised on [date]. Additional information dated [date] was also submitted.

Project

{Provide a detailed description of the proposed project here.}

Proposed Permit

Permit XXXX-VX will be the initial Part 70 operating permit [or renewal/modification of Part 70 operating permit XXXX-VX] for the [facility name].

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Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀			
SO ₂			
NO _x			
CO			
VOC			

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

{List the applicability and exemptions of selected items in the table below.}

ID No.	Requirement	Note

Prevention of Significant Deterioration/Nonattainment Review

{If PSD/non-attainment review is required, present PSD/non-attainment analysis, including BACT/LAER analysis, here.}

Streamlined Equipment Leak Monitoring Program

{Use this section if the facility is under a streamlined equipment leak monitoring program.} It is required that the [facility name] comply with a streamlined equipment leak monitoring program. Compliance with the streamlined program shall serve to comply with each of the fugitive emission monitoring programs being streamlined.

{Modify this paragraph and the following table according to the streamlined fugitive programs for the facility.} For the [facility name], fugitive emissions are subject to the requirements of 40 CFR 63 Subpart H, 40 CFR 61 Subpart V, 40 CFR 60 Subpart VV, LAC 33:III.2122, and LAC 33:III.5109. Among these regulations, 40 CFR 63 Subpart H is the overall most stringent program. Therefore, fugitive emissions shall be monitored as required by this program (40 CFR 63 Subpart H).

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Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
[Facility Name]	40 CFR 63 Subpart H – HON	≥ 5% VOHAP	40 CFR 63 Subpart H – HON
	40 CFR 61 Subpart V – NESHAP for Equipment Leaks	≥ 10% VCM	
	40 CFR 60 Subparts VV – NSPS for Equipment Leaks of VOC in SOCMIs or Refineries	≥ 10% VOC	
	LAC 33:III.2122 – Fugitive Emission Control for Ozone Nonattainment Areas and Specified Parish	≥ 10% VOC	
	LAC 33:III.5109 – Louisiana MACT Determination for Non-HON Sources	≥ 5% VOTAP	

MACT Requirements

{Insert MACT requirements and analysis here.}

Air Quality Analysis

{Insert air quality analysis and results here, if required.}

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

{If a permit shield is included in the proposed permit. Indicate the permit shield here: Per 40 CFR 60.6(f) and LAC 33:III.507.I, permit shields have been determined for the proposed permit. The details of the permit shield are given in the Permit Shield section of the proposed permit.}

VI. PERIODIC MONITORING

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{Insert the periodic monitoring requirements here.}

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

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Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.